

ORIGINAL

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December 18, 2013

FEDERAL EXPRESS

Ms. Alisa Carro Bentley, Secretary Delaware Public Service Commission 861 Silver Lake Boulevard Cannon Building, Suite 100 Dover, Delaware 19904

Re:

Docket No. 13-383

Dear Ms. Bentley:

Enclosed for filing please find an original and ten (10) copies of the Petition to Intervene of Washington Gas Energy Services, Inc. (WGES) in the captioned docket..

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Respectfully submitted,

Telemac N. Chryssikos

Attorney

Enclosure

ORIGINAL

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF DELAWARE

IN THE MATTER OF THE APPLICATION OF)	
CHESAPEAKE UTILITIES CORPORATION)	
FOR APPROVAL OF CHANGES TO)	PSC Docket No. 13-383
TRANSPORTATION AND BALANCING)	
RIDER AND THE GAS SUPPLIER SCHEDULE)	
OF ITS TARIFF (FILED MARCH 11, 2013))	

PETITION TO INTERVENE OF WASHINGTON GAS ENERGY SERVICES, INC.

Pursuant to Order No. 8481 issued November 5, 2013 establishing the above-captioned docket and directing Commission Staff to investigate an Application of Chesapeake Utilities Corporation ("Chesapeake") to make changes to the Transportation and Balancing Rider ("Transportation Rider") and Rate Schedule "SUP" ("Gas Supplier Schedule") of its Tariff ("Application"), Public Notice of such Application, and the Commission's Rules of Practice and Procedure, 26 Del. Admin. C. §1001-2.9, Washington Gas Energy Services, Inc. ("WGES") hereby files this petition to intervene in the above-captioned docket. For support, WGES states as follows:

- 1. WGES Is a retail gas and electricity marketer licensed and actively serving customers in the State of Delaware, Maryland, the District of Columbia, the Commonwealth of Virginia, and the Commonwealth of Pennsylvania.
- 2. WGES is a Delaware corporation, a wholly owned subsidiary of Washington Gas Resources Corporation (itself a wholly owned subsidiary of WGL Holdings, Inc.), and an affiliate of Washington Gas Light Company, a local distribution utility operating in Maryland, Virginia and the District of Columbia.

- 3. Chesapeake filed its Application on October 1, 2013 pursuant to Paragraph 13 of a Proposed Settlement Agreement adopted by the Commission in Order No. 8483, August 13, 2013, PSC Docket No. 12-450F. Chesapeake seeks to modify its Tariff to establish a new, revised allocation of upstream pipeline capacity that it currently holds to serve its firm residential and commercial customers. Specifically, Chesapeake proposes to reallocate some of that capacity to its transportation customers for the first time. Chesapeake proposes that the changes to its Tariff to implement the new approach be approved to become effective on April 1, 2015.
- 4. In Order No. 8481 the Commission directed that Chesapeake publish notice of the Application in designated newspapers in Delaware on or before November 15, 2013, that such notice state that petitions to intervene must be filed on or before December 18, 2013 and written comments, suggestions, and objections to the Application must be filed on or before December 31, 2013, and that Chesapeake submit proof of such publication prior to December 13, 2013. The Commission further directed its Staff to schedule, notify the public of and conduct workshops with the participation of interested parties, intervenors, and the Delaware Public Advocate for the purpose of reviewing the Application and the comments and objections of interested parties and submitting a report to the Commission detailing its recommendations regarding Chesapeake's proposed changes to its Transportation Rider and Gas Supplier Schedule.
- 5. WGES serves large and intermediate industrial and commercial customers who are transportation customers of Chesapeake under the Transportation and Gas Supplier Schedule. These customers will be directly affected by Chesapeake's proposed changes to its Tariff as will WGES in serving them. Chesapeake proposes to assign

upstream pipeline capacity that it claims it no longer needs to serve its firm residential and commercial utility sales customers to its transportation customers even though these customers have no need of that capacity to receive service from suppliers like WGES.

- 6. WGES intends to file comments objecting to Chesapeake's proposed tariff changes, which would saddle transportation customers with unneeded upstream pipeline capacity they have heretofore not had to pay for. Such changes will adversely impact the competitive gas supply market in Delaware, which transportation customers now can access to achieve energy savings and choices. WGES further intends to participate in the workshops that Staff will schedule and in any formal proceedings that will ensue.
- 7. WGES asks that it be made a party to this proceeding and that all notices, pleadings and orders in the proceeding be served on its undersigned counsel.

WHEREFORE, WGES respectfully requests that the Commission grant this petition to intervene.

Respectfully submitted,

Telemac N. Chryssikos, Esq.

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